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Attorneys for Defendant Lyft, Inc.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BRENDA SUE SATCHELL,

Plaintiff,

v.

LYFT, INC.; DOE DRIVER; DOES II through  
XX, inclusive; and ROE BUSINESS ENTITIES I  
through XX, inclusive,

Defendants.

Case No. 2:20-cv-01201-KJD-VCF

**STIPULATION AND ORDER**  
**DISMISSING LYFT, INC. ONLY**  
**FROM ACTION WITH PREJUDICE**

IT IS HEREBY STIPULATED by and between Carl R. Houston, counsel for Plaintiff, and  
Dana Jonathon Nitz, counsel for Lyft, Inc. that Lyft, Inc. only shall be dismissed with prejudice.

It is further stipulated that the Complaint may be amended to substitute Jose Garcia for the  
defendant named in the Complaint as "DEFENDANT JOSE."

**ORDER**

IT IS HEREBY ORDERED that Lyft, Inc. only shall be dismissed without prejudice.

IT IS FURTHER ORDERED that Jose Garcia may be substituted for Jose Garcia for the defendant named as "DEFENDANT JOSE," in the Complaint.

IT IS FURTHER ORDERED that the action may be remanded to Clark County District Court; and Plaintiff's Motion to Remand is withdrawn as moot.

IT IS FURTHER ORDERED that each party will bear its own fees and costs.

DATED: 2/2/2021

  
UNITED STATES DISTRICT JUDGE

Respectfully submitted by,  
SELMAN BREITMAN LLP

By: /s/ Dana Jonathon Nitz  
DANA JONATHON NITZ  
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3993 Howard Hughes Parkway, Suite 200  
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Attorneys for Defendant Lyft, Inc.

Selman Breitman LLP  
ATTORNEYS AT LAW

**Bonnie Juarez**

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**From:** Carl R. Houston <Carl@ladahlaw.com>  
**Sent:** Thursday, January 21, 2021 4:23 PM  
**To:** Dana J. Nitz  
**Cc:** Bonnie Juarez; Tressy Kip  
**Subject:** RE: Satchell v. Lyft, Inc., et al / Case No. 2:20-cv-01201-KJD-VCF

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dana,

Ok—I'm amenable. Please add my requested clarification, and then feel free to insert my e-signature.

Regards,

Carl R. Houston, Esq. ■ Attorney at Law



**LADAH LAW**  
FIRM

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**From:** Dana J. Nitz [mailto:[dnitz@selmanlaw.com](mailto:dnitz@selmanlaw.com)]  
**Sent:** Wednesday, January 20, 2021 9:58 AM  
**To:** Carl R. Houston <Carl@ladahlaw.com>  
**Cc:** Bonnie Juarez <[bj Suarez@selmanlaw.com](mailto:bj Suarez@selmanlaw.com)>; Tressy Kip <[Tressy@ladahlaw.com](mailto:Tressy@ladahlaw.com)>  
**Subject:** RE: Satchell v. Lyft, Inc., et al / Case No. 2:20-cv-01201-KJD-VCF

Carl,  
It made more sense to me to have the substitution **now** dismiss Lyft **now** and stipulate to remand. We have a court that has jurisdiction **now** instead of waiting for the remand process to work its way through. We were willing to stipulate to allow the substitution and remand if Lyft was dismissed. Dismissing Lyft and substituting Garcia would be done in the same order, so we both get what we want. It seems unlikely that Judge Dawson will remand now given the delay since you filed your motion and requested to supplement. As far as the fees and costs provision, I put that in because Judge Dawson has awarded fees and costs on other cases where he remands. If you wanted to clarify that that was between Lyft and Satchell, since they are the only parties, that's fine. We should definitely act now with the looming deadlines in federal court.

**Dana Jonathon Nitz**  
Of Counsel

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**SELMAN**

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